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10 *Attorneys for Plaintiff Kimberly Yordy and the putative class*

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12 **UNITED STATES DISTRICT COURT**
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14 **NORTHERN DISTRICT OF CALIFORNIA**
15
16 **SAN FRANCISCO DIVISION**

17 KIMBERLY YORDY, individually and on
18 behalf of all others similarly situated,

19 *Plaintiff,*

20 v.

21 PLIMUS, INC., a California corporation,

22 *Defendant.*

Case No. 12-cv-00229-TEH

**PLAINTIFF'S SUPPLEMENTAL FILING
IN SUPPORT OF MOTION FOR CLASS
CERTIFICATION**

Judge: Honorable Thelton E. Henderson

I. IDENTIFICATION OF THE UDWs AND CITATIONS TO EVIDENCE.

By Order entered September 25, 2013, and in advance of the hearing on Plaintiff's motion for class certification (the "Motion") scheduled for October 7th, the Court requested, *inter alia*, that Plaintiff make a supplemental filing that identifies each Unlimited Download Website ("UDW") "she claims was involved in Plimus's alleged scheme, citations to any evidence of the allegedly false statements that appeared on each site, and citations to any evidence that Plimus worked on advertising or marketing for that site." (Dkt. 113.) Accordingly, Plaintiff provides the table below that—in the left-hand column—identifies by URL each of the nineteen (19) UDWs at issue in Plaintiff's Motion and—in the right hand column—identifies the evidence she contends shows the false statements on each of them and Plimus's role in their marketing activities.¹

Unlimited Download Website	Evidence of False Statements & Plimus's Involvement
www.mypadmedia.com	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 7 • Plaintiff's Class Certification Motion, Ex 10, p. 13 • Plaintiff's Class Certification Motion, Ex 11, p. 7 • Plaintiff's Class Certification Motion, Ex 17, PLIMUS0028-0031, PLIMUS0033 • Plaintiff's Class Certification Motion, Ex 19 • Plaintiff's Class Certification Motion, Ex 22 • Plaintiff's Class Certification Motion, Ex 23
www.ereaderslibrary.com	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 17, PLIMUS0033, PLIMUS0135-0136
www.wiidownloadbay.net	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 17, PLIMUS0140-0141
www.allconsoledownloads.com	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 4, pp. 9-10 • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 10, p. 9

¹ To be clear, as Plaintiff explained in her Motion and reply brief, each statement made on the UDWs regarding the availability of any digital media were false inasmuch as none of the media or titles identified by the UDWs were actually available for download, or were only available for download through illegal torrent websites.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	<p>www.allconsoledownloads.com (cont'd)</p> <p>www.thenovelnetwork.com</p> <p>www.themoviehome.com</p> <p>www.downloadanimevideos.com</p> <p>www.thereadingsite.com</p> <p>www.thedroidlibrary.com</p> <p>www.youripodmovies.com</p> <p>www.pspgodownloadcenter.com</p> <p>www.tvshowexpress.com</p>	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 25 • Plaintiff's Reply Brief, Ex 1, p. 1 <ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 3, pp. 10-12 • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 10, p. 13 • Plaintiff's Class Certification Motion, Ex 14 • Plaintiff's Class Certification Motion, Ex 17, PLIMUS0002-0006, PLIMUS0033-0034 • Plaintiff's Class Certification Motion, Ex 23 • Plaintiff's Class Certification Motion, Ex 33 <ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 8, p. 2 • Plaintiff's Class Certification Motion, Ex 10, p. 13 • Plaintiff's Class Certification Motion, Ex 17, PLIMUS0158 • Plaintiff's Class Certification Motion, Ex 23 <ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Reply Brief, Ex 1, p. 3 <ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 10, p. 13 • Plaintiff's Class Certification Motion, Ex 17, PLIMUS0033, 0035-0038 • Plaintiff's Class Certification Motion, Ex 23 • Plaintiff's Class Certification Motion, Ex 33 • Plaintiff's Class Certification Motion Ex 39, PLIMUS0030 <ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 10, p. 13 • Plaintiff's Class Certification Motion, Ex 17, PLIMUS0039 • Plaintiff's Class Certification Motion, Ex 23 <ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Reply Brief, Ex 1, p. 12 <ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 10, p. 8 <ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Reply Brief, Ex 1, p. 10
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www.pocketdownloadcenter.com	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 10 pg. 9 • Plaintiff's Reply Brief, Ex 1, p. 9
www.full-tv-downloads.com	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 40 • Plaintiff's Reply Brief, Ex 1, p. 7
www.cinema-on-demand.net	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 8, p. 3 • Plaintiff's Reply Brief, Ex 1, p. 2
www.epadmedia.com	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Reply Brief, Ex 1, pp. 4-6
www.wiidownloadhub.com	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 32 • Plaintiff's Reply Brief, Ex 1, p. 11
www.gamestationbay.com	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Reply Brief, Ex 1, p. 8
www.360downloadcenter.com	<ul style="list-style-type: none"> • Plaintiff's Class Certification Motion, Ex 6 • Plaintiff's Class Certification Motion, Ex 17, PLIMUS0139

* * *

Plaintiff will be prepared to discuss the above-referenced information and the other questions raised by the Court in its September 25th Order at the hearing on October 7th.

Respectfully submitted,

KIMBERLY YORDY, individually and on behalf of
all others similarly situated,

Dated: October 1, 2013

By: /s/ Benjamin H. Richman

One of Plaintiff's Attorneys

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